

CARDILLO & CORBETT

TULIO R. PRIETO
JAMES P. RAU

145 Hudson Street
New York, New York 10013
212-344-0464

JOSEPH CARDILLO, JR.
(1913-1980)
ROBERT V. CORBETT
(1939-2014)

FAX: 212-797-1212/509-0961
EMAIL: CC@CARDILLOCORBETT.COM

September 14, 2021

VIA ECF

Honorable Paul A. Engelmayer
United States District Judge
40 Foley Square
New York, NY 10007

Re: Docket No. 1:19-cv-3842 (PAE)(SN)
Liberty Global Logistics LLC v. Bomin Bunker Oil Corp.
Our file: E-977

Honorable Sir:

We and our co-counsel, Hill Betts & Nash, are the attorneys for the Plaintiff Liberty Global Logistics LLC ("Liberty") in the captioned matter. We respectfully request a one-week extension for the parties' pretrial submissions, including a joint proposed pretrial order, motions *in limine*, and all other filings required by the Court's Individual Rule 5 relating to bench trials. The pretrial submissions are due by September 17, 2021, and the oppositions to the motions *in limine* are due by September 24, 2021. If our application is granted, the pretrial filings would be due by September 24 and the opposition to the motions would be due by October 1, 2021. Wilson Elser, counsel for Defendant Bomin Bunker Oil Corp. ("Bomin"), has no objection to this request. Neither party requests any change in the the dates scheduled for the pretrial conference and trial, respectively October 13 and October 26 through October 28, 2021.

The reason for this request is that it has been difficult to complete the affidavits/declarations required of all witnesses who are located abroad or out of state or who are traveling abroad and to assemble the large number of exhibits that accompany each affidavit/declaration. We can state with confidence that we will be able to finish completion of the affidavits/declarations by the extended date.

Thank you for your consideration.

Respectfully yours,

CARDILLO & CORBETT

By: /s/ Tulio R. Prieto
Tulio R. Prieto

TRP/lgb

Honorable Paul A. Engelmayer
United States District Judge

2

September 14, 2021

cc: Defendant's Counsel Via ECF

SO ORDERED.

In light of the firm, fast-approaching trial
date, no further extensions will be granted.

September 14, 2021

A handwritten signature in cursive script, reading "Paul A. Engelmayer", written in black ink.

PAUL A. ENGELMAYER
United States District Judge